

Many of you are concerned about the introduction of daily lateral flow testing. As you know, [the guidance](#) was published last Friday and the policy is due to be implemented by 16 February.

Last week we collected your feedback, discussed it with DHSC officials, and raised it to the attention of both the CQC and the Minister.

We have continued to engage with the Department about the issues this week, including meeting them specifically about the situation for live-in care. We are working with colleagues in other parts of the care sector who share our concerns to consider how we can address the issues.

We will continue to argue for a proportionate and workable testing system that has parity with NHS colleagues.

Two particular concerns have arisen frequently from our members with regards to this policy and we wanted to share what we have been told on those topics.

The below reflects our best understanding of the position from communications with relevant officials at the time of writing this alert. The policy change on testing is evolving and official guidance may be refined or altered in coming weeks.

We are pressing for official guidance to be amended to specifically respond to and clarify the issues we have raised. In the meantime, our usual disclaimer applies, see below.

Early morning tests

Firstly, many of you are concerned about staff testing before work when they are starting early in the morning. This is for two main reasons, one in terms of staff needing to start work very early and the other to do with managing to rearrange rotas at that time in the morning should someone test positive.

We asked officials at the Department of Health and Social Care whether it would be permissible for staff to test the night before they work. We received the following response:

“on the matter of when the test can be conducted, the closer the test is conducted to engagement the more effective it is in identifying infection and preventing transmission, however we absolutely recognise the challenge this presents for those starting shifts very early and the disruption caused should the test be positive, therefore managers are best placed to make this judgement and as such if they are content that this is an appropriate way to support implementation of the testing guidance then conducting the tests the night before could be a pragmatic approach”.

On recording test results

The CQC have said: “we will be asking what systems and processes a provider has in place to meet the testing requirements and how those systems and processes are working”.

The homecare guidance says “Providers do not need to retain records of proof of [test] registrations” (e.g. texts and emails from NHS test and trace)

We have discussed this with staff at DHSC and the CQC. Our understanding based on our discussions is as follows:

The new guidance does not mean that all providers need to keep a spreadsheet with the result of every test their staff do. It also does not mean you must save copies of every text message or email staff get from NHS Test and Trace on a central computer system to prove compliance.

The new guidance does mean that you need to have systems or processes in place that give you a reasonable degree of confidence that your staff are, in fact, testing in line with the guidance, logging results online with NHS Test and Trace, not coming to work when results are positive, and are meeting other requirements of the guidance.

It is likely that part of those systems and process would involve checking if your staff are testing. There are different ways of doing this. Managers will want to consider the most appropriate method for their organisation. For example, in some organisations checking a sample of test results periodically might be an appropriate part of how you implement the guidance; in others, supervisors might check that careworkers have been testing in supervisions. This will need to be something that will work well in your organisation and give you the confidence you need that the guidance is being followed and COVID risks managed.

Please feel free to get in touch with our helpline:

helpline@homecareassociation.org.uk if your CQC inspector or another relevant official requests a complete record of every test your staff have done.

Disclaimer: Whilst every effort has been made to ensure the accuracy of this alert, it is a summary, rather than a definitive statement of the law; advice should be taken before action is implemented or refrained from in specific cases. No responsibility can be accepted for action taken or refrained from solely by reference to the contents of this alert.

Kind regards,

Homecare Association